

20cr 245 PAM/HB

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 2

v.

18 U.S.C. § 371

RICHARD ALONZO WOODS,
a/k/a "Woody,"

18 U.S.C. § 922(g)(1)

Defendant.

18 U.S.C. § 924(c)

18 U.S.C. § 924(d)(1)

18 U.S.C. § 924(o)

18 U.S.C. § 981(a)(1)(C)

18 U.S.C. § 1951

18 U.S.C. § 2113(a)

18 U.S.C. § 2113(d)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Interference with Commerce by Robbery)

On or about February 4, 2018, in the State and District of Minnesota, the defendant,

**RICHARD ALONZO WOODS,
a/k/a "Woody,"**

aiding and abetting and being aided and abetted and abetted by others, did knowingly and unlawfully obstruct, delay and affect commerce and the movement of articles and commodities in such commerce by robbery, in that the defendant did unlawfully and knowingly take and obtain clothing and accessories and U.S. currency, all the personal property of Project SoZo, located in Minneapolis, Minnesota, a commercial business then engaged in and affecting interstate commerce, in the presence of at least one victim employee, against his or her will by means of actual and threatened force, violence, and

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fear of injury, immediate and future, to his or her person, all in violation of Title 18, United States Code, Sections 2 and 1951.

COUNT 2
(Armed Bank Robbery)

On or about February 22, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

by force, violence, and intimidation, did take from the person and presence of another, approximately \$6,191 in United States currency belonging to and in the care, custody, control, management, and possession of Lake Area Bank, in White Bear Lake, Minnesota, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

COUNT 3
(Armed Bank Robbery)

On or about May 4, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

by force, violence, and intimidation, did take from the person and presence of another, approximately \$88,618 in United States currency belonging to and in the care, custody, control, management, and possession of Bremer Bank, in Brooklyn Center, Minnesota, a bank whose deposits were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, the defendant did assault and put in jeopardy the life of another

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person by the use of a dangerous weapon, that is a firearm, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

COUNT 4

(Carrying a Firearm During and in Relation to a Crime of Violence)

On or about February 4, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

did knowingly brandish, use, and carry a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery, as alleged in Count 1 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 5

(Carrying a Firearm During and in Relation to a Crime of Violence)

On or about February 22, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

did knowingly brandish, use, and carry a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Armed Bank Robbery, as alleged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 6

(Carrying a Firearm During and in Relation to a Crime of Violence)

On or about May 4, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

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did knowingly brandish, use and carry a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Armed Bank Robbery, as alleged in Count 3 of this Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT 7
(Felon in Possession of a Firearm)

On or about May 21 and May 22, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

having previously been convicted of the following crimes, each of which was punishable by imprisonment for a term exceeding one year:

<u>Date (on or about)</u>	<u>Crime</u>	<u>Jurisdiction</u>
December 18, 2002	Third Degree Controlled Substances Sale	Ramsey County, Minnesota
February 5, 2003	Third Degree Controlled Substances Sale	Ramsey County, Minnesota
February 3, 2005	Check Forgery	Ramsey County, Minnesota
August 16, 2006	Possession of Firearm by an Ineligible Person	Ramsey County, Minnesota
August 21, 2006	Fifth Degree Controlled Substances Possession	Ramsey County, Minnesota
January 31, 2013	Felon in Possession of a Firearm	Federal District of Minnesota

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and knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate commerce, firearms, that is, (1) a Glock, model 27, semiautomatic .40-caliber pistol, bearing serial number BXL196, and (2) a H & K semiautomatic handgun, all in violation of Title 18, United States Code, Sections 922(g)(1).

COUNT 8
(Conspiracy – Armed Bank Robbery)

From at least on or about February 22, 2018, and continuing through at least on or about May 4, 2018, in the State and District of Minnesota, the defendant,

RICHARD ALONZO WOODS,
a/k/a “Woody,”

knowingly and intentionally conspired with others, known and unknown to the grand jury, to take by force, violence, and intimidation from the person and presence of another, approximately \$6,191 in United States currency belonging to and in the care, custody, control, management and possession of Lake Area Bank in White Bear Lake, Minnesota, and approximately \$88,618 in United States currency belonging to and in the care, custody, control, management, and possession of Bremer Bank in Brooklyn Center, Minnesota, banks whose deposits were then insured by the Federal Deposit Insurance Corporation. In committing such offenses, the defendant did assault and put in jeopardy the life of another person by the use of a dangerous weapon, that is a firearm.

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Overt Acts

In furtherance of the conspiracy and to achieve the objectives and purposes thereof, the defendant and other persons known and unknown to the Grand Jury, committed and caused the commission of the following overt acts in the District of Minnesota:

1. The defendant and others known and unknown to the Grand Jury, wore masks and gloves to hide their identities and facilitate the robberies.
2. The defendant and others known and unknown to the Grand Jury, drove past the Lake Area Bank for the purpose of casing the bank in advance of the robbery.
3. On or about February 22, 2018, the defendant and others known and unknown to the Grand Jury, possessed firearms in furtherance of the bank robbery conspiracy.
4. On or about May 4, 2018, the defendant and others known and unknown to the Grand Jury, possessed firearms in furtherance of the bank robbery conspiracy.
5. The defendant and others known and unknown to the Grand Jury, used walkie-talkies to communicate with each other during the Bremer Bank Robbery on May 4, 2018.
6. Following both the February 22, 2018 and May 4, 2018 robberies, the defendant divided the proceeds of the bank robberies with his co-conspirators.

all in violation of Title 18, United States Code, Sections 371, 2113(a), and 2113(d).

COUNT 9

(Conspiracy To Possess Firearms in Furtherance of a Crime of Violence)

From at least on or about February 4, 2018, and continuing through at least on or about May 4, 2018, in the State and District of Minnesota and elsewhere, the defendant,

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RICHARD ALONZO WOODS,
a/k/a "Woody,"

knowingly and intentionally conspired with others, known and unknown to the grand jury, to possess firearms in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, Interference with Commerce by Robbery and Armed Bank Robbery, charged in Counts 1-3 of this Indictment, all in violation of Title 18, United States Code, Sections 924(c)(1)(a)(ii) and 924(o).

FORFEITURE ALLEGATIONS

If convicted of any Count of this Indictment, the defendant,

RICHARD ALONZO WOODS,
a/k/a "Woody,"

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms, ammunition and accessories (including magazines) involved in or used in any knowing violation of Title 18, United States Code Sections 922, 924, 1951, and 2113.

The defendant shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the violations of Title 18, United States Code, Sections 1951 and 2113.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

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A TRUE BILL

for

Sarah
UNITED STATES ATTORNEY

FOREPERSON